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July 8, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Notice of Ex Parte Communication
WC Docket Nos. 02-60, 17-310, 02-6
In the Matters of Rural Health Care Support Mechanism; Promoting Telehealth
and Telemedicine in Rural America; Schools and Libraries Universal Service
Support Mechanism**

Dear Ms. Dortch:

On July 3, 2019, George Tronsrue, Chief Executive Officer and Michael McHale, Chief Revenue Officer of Quintillion Subsea Operations, LLC ("Quintillion"), and the undersigned, met with Preston Wise, Special Counsel to Chairman Pai, and with Trent Harkrader, Deputy Bureau Chief, D'wana Terry, Associate Bureau Chief, Jesse Jachman, Legal Advisor, and Gabriela Gross, Deputy Division Chief of the Wireline Competition Bureau.

At the meetings, Quintillion discussed its recent written *ex parte* submission filed on June 19, 2019 to reform the funding Alaskans receive from the Federal Communications Commission's Rural Health Care and E-Rate programs.¹ In particular, Quintillion discussed the need to modernize the competitive bidding process across the Rural Health Care and E-Rate programs. Further, Quintillion reviewed analysis of bidding information from both programs that showed a single carrier, GCI, receives 75% of Alaskan funding with 50% of these commitments receiving a single bid. Finally, Quintillion discussed rule reforms to improve the competitive bidding process in these two programs.

Specifically, Quintillion proposed modifying the review period of service providers in both Rural Health Care and E-rate from a minimum of 28 days to 90 days.² The increased review periods will allow all service providers appropriate time to evaluate and design cost-effective solutions to

¹ Quintillion Subsea Operations, LLC, Ex Parte, WC Docket Nos. 02-60, 17-310, 02-6, <https://www.fcc.gov/ecfs/filing/10619292016997> (filed June 19, 2019).

² *Id.* at 16-19.

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service requests. However, if recipient planning processes or budget impracticalities prevent a 90-day review period, Quintillion would support lengthening the review to 60 days. Quintillion also proposed taking a “fresh look” at single-bid, multi-year commitments in both Rural Health Care and E-Rate.³ If the Commission determined reopening these commitments is appropriate, it could limit this relief to specific services as to which potential new providers certify to the ability to provide improved service or lower cost offerings. This process will ensure competitive providers exist prior to reopening the commitments and focus staff and recipient resources on commitments that can see improvements. Quintillion respectfully requested the Commission act quickly on these reforms to Rural Health Care and E-Rate Program rules that are preventing competitive service providers from delivering lower costs and higher quality services to Alaskans.

Sincerely,

/s/ Russell M. Blau

Russell M. Blau

Counsel to Quintillion Subsea Operations, LLC

cc: Preston Wise, Special Counsel, Chairman Pai
Trent Harkrader, Deputy Bureau Chief, Wireline Competition Bureau
D’wana Terry, Associate Bureau Chief, Wireline Competition Bureau
Jesse Jachman, Legal Advisor, Wireline Competition Bureau
Gabriela Gross, Deputy Division Chief, TAPD, Wireline Competition Bureau

³ *Id.* at 19-20.